

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

**John Malone,
Debtor**

**Chapter 13
Case No. 24-10885**

**RESPONSE TO FEDERAL HOME LOAN MORTGAGE COMPANY'S OBJECTION
TO CONFIRMATION OF DEBTOR'S SECOND AMENDED CHAPTER 13 PLAN**

Now comes the Debtor and responds to Federal Home Loan Mortgage Company's Objection to Confirmation of Debtor's Second Amended Chapter 13 Plan. In support thereof the Debtor states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted, but Debtor has filed a Motion to Sell which provides for Federal Home Loan Mortgage Company's claim to be paid in full, including pre and post-petition arrears.
6. Denied, as the Debtor is seeking to sell his real estate for \$765,000.00 and there is plenty of equity to pay Federal Home Loan Mortgage Company in full from the sale.

Wherefore, the Debtor requests the Court find as follows:

1. Federal Home Loan Mortgage Company's Objection be denied.
2. For such other relief as the Court deems just.

Debtor,
by his attorney,

Dated: November 18, 2025

/s/ John Ullian
John Ullian, Esq. BBO# 542786
Amy Puliafico, Esq. BBO# 682332
The Law Firm of Ullian & Associates, P.C.
220 Forbes Road, Suite 106
Braintree, MA 02184
(781) 848-5980

CERTIFICATE OF SERVICE

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the **RESPONSE TO FEDERAL HOME LOAN MORTGAGE COMPANY'S OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN** by ECF or by mailing a copy of same, postage prepaid, to the following interested parties:

Richard King
Office of the US Trustee
J.W. McCormack Post Office & Courthouse
5 Post Office Sq., 10th Fl, Suite 1000
Boston, MA 02109

Carolyn Bankowski
Chapter 13 Trustee Boston
P. O. Box 8250
Boston, MA 02114

John Malone
28 Savin Hill Avenue
Dorchester, MA 02125

Federal Home Loan Mortgage Corporation
Brian M Kiser
Marinosci Law Group, P.C.
275 West Natick Road, Suite 500
Warwick, RI 02886

Federal Home Loan Mortgage Corporation
Jason Giguere
Zwicker & Associates, P.C.
80 Minuteman Road
Andover, MA 01810

Federal Home Loan Mortgage Corporation
Joseph Dolben
Harmon Law Offices, P.C.
150 California Street
Newton, MA 02458

Dated: November 18, 2025

/s/ John Ullian
John Ullian, Esq. BBO No. 542786
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